

Document Log Item

Addressing	
From	To
"Plaza, Allan@DTSC" <Allan.Plaza@dtsc.ca.gov>	"Iskarous, Michel@DTSC" <MIskarou@dtsc.ca.gov> Carmen Santos/R9/USEPA/US@EPA
CC	BCC
"Sultana, Chand@DTSC" <Chand.Sultana@dtsc.ca.gov>	
Description Form Used: Memo	
Subject	Date/Time
RE: FW: Fwd: Pechiney - Response to City of Vernon EHD Comments to the 2012 FS/RAP	06/26/2012 10:19 AM
# of Attachments	Total Bytes
0	19,185
NPM	Contributor
Processing	
Comments	

Body

Document Body

Hi Carmen, we're planning to approve the RAP this Thursday, June 28 and would appreciate it if you give us comments or concurrence to the proposed responses below. Thanks

-----Original Message-----

From: Iskarous, Michel@DTSC

Sent: Tuesday, June 26, 2012 10:05 AM

To: Santos.Carmen@epamail.epa.gov

Cc: Sultana, Chand@DTSC; Iskarous, Michel@DTSC; Plaza, Allan@DTSC

Subject: Re: FW: Fwd: Pechiney - Response to City of Vernon EHD

Comments to the 2012 FS/RAP

Good morning Carmen,

Allan asked me to send you the below DTSC draft response to the City of Vernon PCBs comments. Please review and provide your input. thanks

Michel Iskarous
Project Manager

Comments 1-3: Received May 7, 2012 from Mr. Leonard Grossberg, Interim Director/Health Officer City of Vernon Health & Environmental Control,
4305 Santa Fe Avenue, Vernon, California 90058

Comment 1: Soils containing PCBs at levels greater than 23 mg/kg are proposed to be left in place at 15 feet below grade and deeper. This may restrict the possible redevelopment of the site, as excavation and compaction of PCB impacted soils may occur and deep footings or piers may be installed.

DTSC Response: The cleanup goal for the native soil at the depth between 5 to 15 feet below ground surface is 23 mg/kg which has no impact on either ground water or the construction workers during any redevelopment process. The Site will be restricted for residential use including, hospitals, schools and child care centers but can be redeveloped for industrial/commercial purposes. Disturbances of the soil below 15 feet for any construction and redevelopment will require notification to DTSC and a soil management plan.

Comment 2: EHD's policy is that once soils or concrete containing contaminants above the established threshold limits (23 mg/kg of PCB's) have been removed from a location, those materials must be properly disposed of and not placed back into the ground. We read the RAP to allow re-use of such materials, to which EHD objects.

DTSC Response: DTSC issued an Imminent and Substantial Endangerment Determination and Consent Order (Order) in July 2010 to Pechiney.

According to this Order (Section 2.6, Exposure Routes), "certain concrete containing PCBs present in former building slab areas of the Property may be demolished on Site, crushed, and potentially disposed on site as fill soils in excavations and foundation removal areas".

Soil and concrete containing PCB concentrations greater than 23 mg/kg will not be reused as fill material at the Site. According to the draft RAP, PCB-impacted soil from ground surface (0 feet) to a depth of 5 feet bgs with PCB concentrations greater than 3.5 mg/kg, and soil from 5 to 15 feet bgs with PCB concentrations greater than 23 mg/kg will be excavated and transported off-site for disposal at an off-site, permitted facility.

The concrete with PCB concentrations greater than 3.5 mg/kg will be demolished and transported off site for disposal at an off-site, permitted facility.

Comment 3: We understand that Pechiney plans to reuse material and native soils with PCB concentrations greater than 1.0 mg/kg but less than 3.5 mg/kg throughout the site at depths ranging from zero to five feet below grade, and to cover the same with a one foot "interim clean cap." EHD believes that the use of such contaminated materials at shallow depths is not adequately protective of health and the environment, especially since construction at the property likely will expose construction workers during grading, trenching, and excavating work. We prefer a five foot interim clean cap to not expose workers during re-development.

DTSC Response: The U.S. EPA approved remediation goal of 3.5 mg/kg is based on current Cal/EPA toxicity criteria for PCBs and protection of human health assuming commercial/industrial land use and construction worker exposure and on DTSC-recommended reasonable maximum exposure

(RME) assumptions. The 1.0 mg/kg PCB threshold only applies to PCB--impacted concrete--not native soil.

The low-concentration (greater than 1 mg/kg but less than 3.5 mg/kg) PCB-impacted concrete will be placed as "restricted fill" at one location. It will be covered with a minimum of 5 feet of "clean" crushed concrete. This is the only PCB-impacted material planned for on-site reuse. The U.S. EPA approved health-risk based remediation goal for PCB is 3.5 mg/kg.

>>> "Plaza, Allan@DTSC" <Allan.Plaza@dtsc.ca.gov> 6/21/2012 8:53 AM
>>>

From: Carmen Santos [mailto:Santos.Carmen@epamail.epa.gov]
Sent: Thursday, June 14, 2012 9:12 AM
To: Plaza, Allan@DTSC
Cc: Sultana, Chand@DTSC
Subject: Re: Fwd: Pechiney - Response to City of Vernon EHD
Comments to the 2012 FS/RAP

Hello Allan:

Nice to hear from you and hope that you are doing well. I was out of the office all last week, at EPA HQs. And this week, I am working on several high priority projects.

I will be able to review the responses to the City of Vernon next week.

This week is not possible due to several projects that I have to complete between today and Friday. I will be able to review the responses by Wednesday June 20 at the latest. Please let me know if you have any questions concerning this message.

Thank you for your courtesies and have a nice day.

Sincerely,
Carmen

Carmen D. Santos
PCB Coordinator
RCRA Corrective Action Office (WST-5)
Waste Management Division
USEPA Region 9
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"Think left and think right and think low and think high. Oh, the
thinks you can think up if only you try!"Dr. Seuss

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From: Allan Plaza
<APlaza@dtsc.ca.gov<mailto:APlaza@dtsc.ca.gov>>
To: Carmen Santos/R9/USEPA/US@EPA,
Cc: Chand Sultana
<CSultana@dtsc.ca.gov<mailto:CSultana@dtsc.ca.gov>>
Date: 06/12/2012 03:12 PM
Subject: Fwd: Pechiney - Response to City of Vernon EHD Comments
to the 2012 FS/RAP

Hello Carmen, how are you doing? It's been a long time since we worked on the same project. Chand Sultana works for me and we're trying to approve the RAP for Pechiney this Thursday or Friday and need to respond to the City of Vernon's comments regarding the proposed PCB cleanup. If you agree with the responses prepared by Linda Conlan of AMEC we will use her responses to the City's comments. Please let me know if you agree or if you have a different view. Thanks

>>> "Conlan, Linda"
<Linda.Conlan@amec.com<mailto:Linda.Conlan@amec.com>>
6/6/2012 10:23 AM >>>
Chand and Carmen,

Please find attached our response to the City of Vernon's Environmental Health Department's May 7, 2012 comments to the revised April 23, 2012 draft Remedial Action Plan and Feasibility Study for the former Pechiney Cast Plate Inc. Facility. A hard copy of the attached letter will follow by mail. Please let me know if you need any additional information.

Thank you,
Linda Conlan, PG
Principal Geologist
AMEC Environment & Infrastructure, Inc.
121 Innovation, Suite 200, Irvine, CA 92617
Main: 949.642.0245 | Direct: 949.574.7083 | Cell: 949.355.3631 |
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